A STANDARD OPERATING PROCEDURE
for

HAZARDOUS MATERIALS CONTROL

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U.S. General Services Administration
Safety and Environmental Management Team
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INTRODUCTION

This Standard Operating Procedure (SOP) has been developed for the purpose of outlining the general safety and health precautions to be followed during tasks involving use, handling, storage, and disposal of hazardous materials by General Services Administration (GSA) personnel.

Many accidents associated with hazardous materials are due in large part to a failure to recognize the proper handling and use requirements associated with that material. GSA managers and supervisors must take the time and effort to ensure the use, handling, storage, and disposal of hazardous materials is done safely. Successful managers and supervisors will look into the possibility of the most unfavorable situation in every case and take appropriate precautionary measures.

The Occupational Safety and Health Administration (OSHA) has published regulations for the use and handling of various hazardous materials; Title 29, Code of Federal Regulations, Part 1910 (29 CFR 1910). The criteria contained in the regulations are the basis for the requirements set forth in this SOP. Managers and supervisors who insist on compliance with these rules will greatly reduce the chance of an undesirable event occurring with a hazardous material.

This SOP, therefore, is intended to inform GSA managers, supervisors, and employees of the **minimum** requirements of the Hazardous Materials Control Program. Use of this SOP is not mandatory; however, GSA activities having responsibility for work with hazardous materials must either utilize this SOP or develop appropriate alternate procedures pertaining thereto. All procedures must comply with 29 CFR 1910 and be approved by the GSA Region 6 Safety and Environmental Management (SEM) Branch.

This SOP is not to be used by contractors utilizing hazardous materials under a GSA contract. Contractors must comply with all OSHA standards, including preparing and enforcing a written Hazard Communication Program. The procedures developed or initiated by contractors to comply with standards are their responsibility.

A copy of the OSHA standards applicable to the GSA Hazardous Materials Control Program must be available to all supervisors and employees who are required to perform work in conjunction with hazardous materials. A copy of 29 CFR 1910.1200, Hazard

Communication, must be made part of the local activity written procedures.

OSHA standards may be obtained from the local OSHA Area Office or purchased from the Superintendent of Documents, Government Printing Office, Washington, DC 20402.

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HAZARDOUS MATERIALS CONTROL

1. **POLICY**. It is GSA's policy to maintain a safe and healthful workplace for all GSA employees and ensure all employees exercise every reasonable precaution against accidental exposure to hazardous materials. This will involve compliance with regulations promulgated by the Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), Department of Transportation (DOT), as well as related state and local regulations. Elements of this program include establishment of procedures and responsibilities for acquisition, use, handling, storage, and disposal of hazardous chemicals; providing training for employees using these chemicals; and ensuring proper labeling of chemicals.

2. **REFERENCES**.

a. OSHA 29 CFR 1910.106, Flammable and Combustible Liquids.

b. OSHA 29 CFR 1910.1200, Hazard Communication.

c. OSHA 29 CFR Part 1926, Construction Industry Standards.

d. EPA 40 CFR Parts 260 thru 281, Solid Wastes.

e. EPA 40 CFR Parts 300 thru 373, Superfund, Emergency Planning, and Community Right-to-Know Programs.

f. DOT 49 CFR Parts 171 thru 177, Hazardous Materials Regulations.

g. Federal Property Management Regulations, Subpart 101-46.4.

h. GSA SOP for a Written Hazard Communication Program.

i. GSA SOP for Emergency Eyewash and Shower Equipment.

j. GSA SOP for Selection, Care, and Use of Respiratory Protection.

3. **DEFINITIONS**. The following definitions are used within this SOP:

a. Article. A manufactured item, other than a fluid or a particle which:

(1) Is formed to a specific shape or design during manufacture;

(2) Has end use function(s) dependent in whole or in part upon its shape or design during end use; and

(3) Under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts, of a hazardous chemical and does not pose a physical hazard or a health risk to employees.

b. Chemical (or "material"). Any element, chemical compound, or mixture of elements/compounds.

c. Combustible Liquids. Any liquid having a flash point at or above 100 degrees Fahrenheit (°F) or 37.8 degrees Celsius (°C) (see Figure 1). Combustible liquids may be divided into two classes, as follows:

(1) Class II Liquids. Include those with flash points at or above 100°F (37.8°C) and below 140°F (60°C), except any mixture having components with flash points of 200°F (93.3°C) or higher and the volume of which makes up 99 percent or more of the total volume of the mixture.

(2) Class III Liquids. Includes those liquids with flash points at or above 140°F (60°C).

d. Flammable Liquids. Any liquid having a flash point below 100°F (37.8°C), except any mixture having components with flash points of 100°F (37.8°C) or higher and the total of which makes up 99 percent or more of the total volume of the material (see Figure 1). Flammable liquids, known as Class I liquids, are divided into three classes as follows:

(1) Class IA. Includes liquids having flash points below 73°F (22.8°C) and a boiling point below 100°F (37.8°C).

(2) Class IBC. Includes liquids having flash points below 73°F (22.8°C) and a boiling point at or above 100°F (37.8°C).

(3) Class IC. Includes liquids having flash points at or above 73°F (22.8°C) and below 100°F (37.8°C).

FLAMMABLE			COMBUSTIBLE		
F.P. < 100°F			**F.P. ≥ 100°F**		
F.P. < 73°F		F.P. ≥ 73°F & < 100°F	F.P. ≥ 100°F & < 140°F	F.P. ≥ 140°F & < 200°F	F.P. ≥ 200°F
B.P. < 100°F	B.P. ≥ 100°F				
Class 1A	**Class 1B**	**Class 1C**	**Class II**	**Class IIIA**	**Class IIIB**

NOTES:
< means "Less Than"
> means "Greater Than"
≥ means "Greater Than or Equal To"
B.P. means "Boiling Point"
F.P. means "Flash point"

Figure 1. Flammable and Combustible Classifications

e. Flash point. That point where, when heat is introduced, the vapor above a liquid will burn in a flash and then dies out.

f. Hazardous Material. Any CHEMICAL which, because of its quantity, concentration, or hazardous properties, can pose a danger to human health as a **PHYSICAL HAZARD** or a **HEALTH HAZARD**, or to the environment, upon release. Hazardous materials include, but are not limited to, explosives, radioactive materials, etiologic agents, flammable liquids or solids, solvents, combustible liquids or solids, poisons, oxidizers or corrosive materials, and compressed gasses. Figure 2, below, provides examples of hazardous materials commonly found in GSA work centers:

Water Treatment Chemicals	Refrigerants & Freons
Radioactive Materials	Adhesives
Solvents & Cleaning Chemicals	Cleaning Compounds
Oxidizers or Corrosive Materials	Compressed Gasses
Flammable Liquids or Solids	Paints, Primers, Thinners
Combustible Liquids or Solids	Welding and Brazing Rods
Battery Acid	Antifreeze
Detergents	Solders & Fluxes
Cutting Oils	Pesticides & Herbicides

Figure 2. COMMON HAZARDOUS MATERIALS IN GSA WORK SPACES

NOTED EXCLUSIONS: The following materials are excluded from the above designations of hazardous materials:

- Consumer Products, when used in the workplace in quantities and at intervals comparable to what might reasonably be used in the home environment, are exempt. Situations where typical consumer-type products are utilized are exemplified by office environments where "White-Out" and glass cleaner is used.

- Tobacco or tobacco products.

- Wood or wood products for which there is evidence that the only hazard they pose to employees is the potential for flammability or combustibility. However, it should be noted some common woods found in carpentry shops are classified as sensitizers or carcinogens.

- Non-hazardous articles, such as tools, etc.

- Foods, drugs, or cosmetics intended for personal consumptive use by employees while in the workplace.

- Nuisance particulates, when evaluated with recommended hazard assessment procedures, no evidence is found to indicate they pose any covered physical or health conditions.

- Hazardous wastes (i.e., hazardous materials intended for disposal). These substances are regulated by the EPA under the Resource Conservation and Recovery Act. However, disposal firms typically require a Material Safety Data Sheet (MSDS) be made available when they pick up hazardous wastes.

g. Health Hazard. Includes chemicals which are carcinogens; toxic or highly toxic agents; reproductive toxins; irritants; corrosives; sensitizers; hepatotoxins; nephrotoxins; neurotoxins; agents which act on the hematopoietic system; and agents which damage the lungs, skin, eyes, or mucous membranes.

h. Immediately Dangerous to Life and Health (IDLH). Any condition which poses an immediate or delayed threat to life or would cause irreversible adverse health effects or interfere with an individual's ability to escape unaided from a space.

i. Immediate-Use Containers. Small containers, 5 gallons or less, into which hazardous materials are transferred from properly labeled containers for use on that shift by the specific employee drawing or transferring the material.

j. Local Activity Manager. Person who exercises authority over a facility, a work center, an operation, a project; and the employees working therein. This individual can be the Property Management Center (PMC) director or designated assistant, Building Manager, Contracting Officer's Representative (COR), division manager, work center supervisor, etc.

k. Lower Explosive Level (LEL). The minimum concentration of a vapor or gas in air below which propagation (spreading away) of flame does not occur upon contact with a source of ignition. Also sometimes referred to as the "Lower Flammable Limit."

l. Non-Routine Tasks. These are foreseeable tasks that employees undertake only infrequently or on a one-time basis. For example, cleaning sludge from the bottom of a tank or cleaning up a spill from a stored material may be non-routine but they are foreseeable; therefore, employees must be informed of the hazards associated with that activity before commencing work.

m. Personal Protective Equipment (PPE). Includes respirators, chemical protective gloves, safety eyewear, hearing protection, emergency eyewash, and shower units, as well as other similar equipment and clothing. Protective clothing is not intended for the convenience nor comfort of the employee, nor to protect personal clothing or uniforms from the normal amount of soil or wear encountered in performing duties of the position.

n. Physical Hazard. A chemical which is classified as a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive), or water-reactive.

4. **RESPONSIBILITIES**.

a. The Regional OSH Program Office shall:

(1) Review MSDS to ensure the materials do not pose unacceptable hazards to GSA employees during reasonable/foreseeable use, handling, storage, or disposal activities.

(2) Provide technical guidance and assistance in implementing and maintaining GSA's Hazard Communication Program.

(3) Provide training resources and assistance in conjunction with the Hazard Communication Program.

b. Local activity managers shall:

(1) Ensure the least hazardous substance will be procured for any use. This is most easily accomplished by ensuring the regional OSH Program office clears procurements of new chemicals prior to procurement.

(2) Ensure the words "HAZARDOUS MATERIAL: MSDS REQUIRED" are included in bold letters in the descriptive block of all purchase requests. When in doubt as to whether or not a product may constitute or contain a hazardous material, include the foregoing phrase (unless exempted under the definition of "Hazardous Material").

(3) Ensure employees are trained in the proper and safe use and handling of hazardous chemicals, and that appropriate PPE is available and used when handling hazardous materials.

(4) Ensure the local activity's hazardous materials inventory is current and MSDS files are current and readily available for all appropriate GSA employees.

(5) Ensure all appropriate GSA employees for whom the local activity manager is responsible are trained on the Hazard Communication Program, as outlined herein.

(6) Ensure non-GSA personnel performing work within GSA spaces for which the local activity manager is responsible are informed of the hazards posed within those spaces.

(7) Develop, implement, and keep current a local written Hazard Communication Program in accordance with this SOP and GSA SOP for a Written Hazard Communication Program.

c. GSA employees are responsible for following the rules and regulations set forth in this policy and applying safe practices in the use of hazardous materials.

5. **IDENTIFICATION OF HAZARDOUS MATERIALS**. To determine whether or not a material is defined as a hazardous substance, review

thoroughly all operations where chemicals are used. Identify any chemicals which are "hazardous" (see definitions in paragraph 3 or contact the regional OSH Program office). MSDSs are critical for the identification of hazardous materials. Look around! Read labels! Identify chemicals in containers, including pipes, but also think about chemicals generated in the work operations. For example, welding fumes, dusts, and exhaust fumes are all sources of chemical exposures.

6. **INVENTORY OF HAZARDOUS MATERIALS**. Each work center in which hazardous materials are used, handled, or stored must maintain a complete and up-to-date inventory of those hazardous materials. Appendix A contains a sample form which may be used to compile the necessary information. Other inventory forms may be used provided they contain at least the following data elements:

- Name/Identification of Product
- Manufacturer of Product
- Quantity of Product Usually On-Hand (10 gallons, 50 pints, etc.)
- Average Usage Rate of the Material (gallons/week, pounds/day, etc.)
- Container Type (50-gallon barrel, 1-pint bottle, etc.)
- Whether or Not an MSDS is Currently On-Hand
- Additionally: The inventory must include, under the "Comments" section, the Shelf Life of the material only if a shelf life or expiration date is indicated by the manufacturer, on the container's label, or on the MSDS. This requirement is necessary for those chemicals who may deteriorate over time to form hazardous (e.g., explosive) forms.

The inventory will be maintained in the work center for ready access by the employees. Additionally, a copy of the inventory shall be forwarded to the regional OSH Program office whenever updated, but at a minimum during ***December of each year***.

7. **MATERIAL SAFETY DATA SHEETS (MSDSs)**. Each workplace facility using, handling, or storing hazardous materials will maintain a library of MSDSs for those hazardous materials used within that facility. Each time supplies are ordered which may contain compounds regarded by OSHA as "hazardous," (see definition of "Hazardous Material" and possible exemptions) an MSDS will be requested, unless a **current** MSDS is already in the local file. When purchasing products locally which may contain hazardous materials, a request to the manufacturer will be

prepared and forwarded requesting an MSDS be provided, unless a **current** MSDS is already on file.

a. MSDS Acceptability. MSDSs must be fully completed and received at the facility either prior to or at the time of receipt of the first shipment of any potentially hazardous chemical purchased from a vendor. Each new MSDS will be reviewed for completeness and accuracy upon receipt. Labels do not take the place of MSDSs!

b. MSDS Libraries. A notebook, folder, file, etc., containing MSDSs for those hazardous materials currently being utilized will be established and maintained current at each primary workplace location where the hazardous material(s) are being utilized. Copies of each MSDS shall be located as follows:

c. MSDS Availability. Employees shall be provided ready access to the MSDSs whenever they are on duty. The employees are not to be required to request an MSDS from a supervisor or foreman in order to review the MSDS. It would not be appropriate, for example, to file the MSDSs in the supervisor's office if it is kept locked when he/she is out (such as at night, on leave, etc.). This inhibits access by the employees to the MSDSs. The MSDSs must be located in an area which is readily accessible to employees at all times while they are on duty. There is an exception to this rule for Multiple Workplaces (see below).

d. Multiple Workplaces. Where employees must travel between a central location and remote workplaces during a workshift, (i.e., employees are dispatched from a central location at the beginning of the work shift but their work is carried out at more than one geographical location), MSDSs may be kept at a readily accessible central location at the primary workplace facility. Employees in the field may call into the primary workplace facility to request information from an MSDS during normal working hours. This information may be relayed to the requesting employee over the telephone or by fax. If desired, copies of MSDSs may be maintained at each field site containing hazardous materials; however, it is only required MSDSs be available at the primary workplace location.

e. Outdated MSDSs. MSDSs may become outdated for several reasons; such as, being revised and superseded, the hazardous material no longer being used within the work center, etc. However, each MSDS received on hazardous materials to which GSA employees are occupationally exposed should be maintained for at

least 30 years. Outdated MSDSs should not be filed with current MSDSs as it makes retrieval of current MSDSs a problem. A separate notebook or file for outdated MSDSs should be established and maintained.

f. Non-Receipt of MSDSs. Should a vendor not cooperate with supplying MSDSs it may be necessary to discontinue procurements from that vendor. MSDSs must be received in a timely manner, fully completed, and readable in order to show cooperation.

8. **LABELS AND OTHER FORMS OF WARNING**. Local activity managers shall ensure all hazardous materials are properly labeled, tagged, or marked at all times -- whether in storage or in use.

a. Labels must list at least the chemical identity; appropriate hazard warning (health hazards and physical hazards); target organs likely to be affected by exposure to the chemical; and the name and address of the manufacturer, importer, or other responsible party.

b. MSDSs do not take the place of labels! Local activity managers will refer to the corresponding MSDS to verify label information.

c. Employees using hazardous materials are responsible for ensuring the proper labels are affixed to the container.

d. Whenever hazardous materials are transferred from one container to another, the employee performing the transfer is responsible for ensuring the appropriate required labels are applied. **This is to occur at the time of transfer!**

e. Formats for labels used for in-house containers will be approved by the local activity manager, in consultation with the regional OSH Program office, prior to their use.

f. Local activity managers will check periodically to ensure all containers are labeled and labels are up-to-date.

g. When hazardous materials are received, the labels which have been placed upon the packaging in compliance with DOT regulations shall be maintained until the hazardous materials have been removed such that they no longer present a health or safety risk.

h. Where labels are removed, obscured, damaged, or defaced, the local activity manager shall ensure replacement labels are promptly applied to the container.

i. Immediate-use Containers. Immediate-use containers (see definition for requirements) do not require labeling. However, if "immediate-use containers" are larger than 5 gallons, their contents are not used within the work shift during which the transfer into the container occurred, or employees other than the employee who accomplished the transfer into the container use the container, these small containers must be labeled immediately upon:

- Transfer of hazardous materials into the container, or
- When the other use commences.

9. **TRAINING**. Each employee who works with or is potentially exposed to hazardous materials must receive training on the Hazard Communication Standard, OSHA 29 CFR 1910.1200, and this SOP; including the safe use, handling, storage, and disposal of those hazardous materials. The regional OSH Program office should be contacted to arrange to have required training conducted.

a. Frequency of Training. This training will be provided within 30 days of initial assignment to a workplace or introduction into the workplace of a new hazardous material or a new hazard. Additional training is recommended at least annually, but must be provided for employees whenever a new hazardous material is introduced into the workplace or a new hazard is introduced by a current material (such as by new handling procedures).

b. Content of Training. This training shall include, at a minimum:

(1) An understanding of what hazardous substances are, the specific hazardous materials known or suspected to be present in the employee's work areas, the risks associated with them in an incident, and an understanding of the potential outcomes associated with an emergency created when hazardous substances are present.

(2) Methods and observations which may be used to detect the presence or release of a hazardous material in the work area (odor, visual, air monitoring devices available, etc.)

as well as to identify the specific hazardous substances, if possible.

(3) Procedures for conducting small-quantity spill/leak control and cleanup. Small-quantity leaks or spills are those releases which can be controlled and cleaned up by one or two individuals without outside, specialized assistance, less than approximately 10 gallons.

(4) The physical and health hazards of the chemicals in the work area.

(5) The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from hazardous chemicals; e.g., appropriate work practices, emergency procedures, PPE to be used, etc.

(6) The details of the Hazard Communication Program and the Hazardous Chemical Control Program, outlined herein, including an explanation of the labeling system and the MSDSs, and how employees can obtain and use the appropriate hazard information.

(7) An understanding of the role of the First Responder Awareness Individual in GSA's Emergency Response Plan, including site security and control.

(8) The ability to realize the need for additional resources and to make the appropriate notifications to emergency response personnel.

10. **PURCHASE REQUESTS FOR HAZARDOUS MATERIALS**.

a. Local activity managers will ensure all requests and purchase orders for materials which contain or may contain hazardous materials include the words "HAZARDOUS: MSDS REQUIRED." This is not necessary if it is known that the material does not contain hazardous materials.

b. The purchasing agent will place "HAZARDOUS: MSDS REQUIRED" in bold letters in the description of each line item of the purchase order when a chemical is identified as hazardous.

c. Local activities must obtain the MSDS for each hazardous material it purchases before the material is used. Whenever

materials have been received without an MSDS, the using work center will initiate actions to obtain the proper MSDS. This may include, but is not limited to, contacting the manufacturer or supplier of the product and requesting that an MSDS be immediately forwarded; faxes may be used to facilitate this procedure. Should the manufacturer and the supplier both refuse to submit an MSDS, the regional OSH Program office should be contacted for further assistance and guidance.

11. **USE OF HAZARDOUS MATERIALS**. It is not within the scope of this SOP to identify the specific procedures or restrictions regarding the use of hazardous materials used by GSA. A review of the MSDS for the material being used will identify general use precautions and requirements which should be followed. The regional OSH Program office will provide additional specific use requirements when the MSDS does not provide adequate information, for specific operations, or upon request.

12. **HANDLING OF HAZARDOUS MATERIALS**. A container holding hazardous materials must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak. If leaks or spills occur, immediate actions must be taken to control the leak or spill, as outlined elsewhere in this SOP.

13. **STORAGE OF HAZARDOUS SUBSTANCES**. All storage must conform to OSHA and GSA requirements. Provisions must be in place to control releases from containers so as to prevent presenting a hazard to human health, the public, or to the environment. Containers of hazardous materials not currently in use must be placed in secure areas; such as, inside storage rooms, flammable storage lockers, etc. This subsection does not apply to Class I or II liquids in the fuel tanks of motor vehicles, aircraft, boats, or portable or stationary engines.

a. General Storage Requirements. Containers of hazardous materials must be stored in such a manner as to protect them from chemical and physical harm. This includes, but is not limited, to weathering, corrosion from other chemicals, vehicular hazards, vandalism, etc.

(1) Containers for hazardous materials must be made of or lined with materials which are compatible with and appropriate for their contents so the ability of the container to contain the material is not impaired. This information is presented on the applicable MSDS. For example, acids must not be placed into metal containers and gasoline must not be

dispensed from containers unless classified by OSHA as "safety cans."

(2) Storage conditions must afford protection from damage from traffic and vandalism.

(3) Storage conditions must afford protection from weather conditions year-round. Rain, ice, and snow can cause containers to rust, resulting in leaks. Exposure to direct sunlight can, during hot temperatures, cause containers to bulge and rupture.

(4) Storage area must provide spill containment; such as, liquid-tight floor and floor-to-wall joints, and diking or raised sills and ramps (minimum of 4 inches in height and capable of containing the contents of the largest container stored within the area). This is designed to prevent leaks, spills, and releases from escaping from the containment area. An acceptable alternate to diking, sills, or ramps is an open-grated trench inside the room which drains to a safe location.

(5) Storage conditions must ensure incompatible materials are segregated, such as:

- Acids physically separated from bases and caustics.

- Oxygen cylinders stored separate from other combustibles and fuel gases. Separate storage entails either separation by at least 20 feet or a one-half hour firewall.

(6) Storage area must be secured from access by unauthorized personnel, such as by a locked door. Door must be labeled.

(7) Storage area must be afforded emergency eyewash/shower unit, fire protection, and other PPE deemed necessary by regional safety office.

(8) Storage cannot be arranged so as to limit use of exits, stairways, or areas normally used for the safe egress of people from the area or from the building.

b. Inside Storage Room. In general, an inside storage room for hazardous materials must meet OSHA and National Fire

Protection Association requirements. Storage capacity (types of materials and quantities) are dependent upon the specific construction afforded the storage room. The minimum requirements for an inside storage room are as follows:

(1) Must provide adequate exhaust ventilation. Contact the regional OSH Program office for guidance regarding what constitutes "adequate" rates of ventilation. This determination must be based upon the nature and quantity of the stored materials.

(2) Door and window openings to the storage room must be properly constructed. Again, this is dependent upon the nature and quantity of the materials stored within the room; contact the regional OSH Program office for guidance.

(3) Construction materials and electrical wiring and equipment used will be dependent upon the specific hazardous materials to be stored within the room. Specific guidance regarding these must be requested from the regional OSH Program office prior to construction.

c. Storage in Office Occupancies. Storage of hazardous materials in office occupancies must be controlled to that quantity which is required for the immediate maintenance and operation of the building and equipment within the building. Such storage must be kept in properly constructed and labeled containers stored in a storage cabinet or in safety cans, or in an inside storage room (meeting OSHA standards for an "inside storage room") not having a door that opens into that portion of the building used by the public (see paragraph: INSIDE STORAGE ROOMS).

d. Storage in Industrial Areas. Storage of hazardous materials in larger quantities than would be found in office occupancies require special provisions. For these cases, the regional OSH Program office should be contacted for guidance and direction.

14. **NON-ROUTINE TASKS**. Local activity managers contemplating a non-routine task should first consult with the regional OSH Program office and ensure employees are informed of chemical hazards associated with the performance of these tasks, appropriate protective measures to be taken, and other precautions needed to protect employees, visitor, etc. This must be accomplished before work is begun, as otherwise outlined within this SOP.

15. **DISPOSAL OF HAZARDOUS MATERIALS. Hazardous materials must, in all instances, be disposed of properly.** In many instances, hazardous materials may be recycled. This is frequently the preferred disposal strategy, especially for spent fluorescent lamps, batteries, and toner cartridges. Because different States regulate hazardous wastes differently from one another and, in many instances, from the U.S. EPA it is imperative that you contact the regional OSH Program office for assistance with disposal options. It is beyond the scope of this SOP to discuss all the aspects of disposal of hazardous materials. For assistance with this subject, contact the regional OSH Program office.

16. **PERSONAL PROTECTIVE EQUIPMENT (PPE).** Engineering or administrative methods are the preferred means to control employees' exposure to hazardous materials. Where such means are not feasible, PPE may be required to reduce excessive exposures. PPE must be selected on the basis of its specific design; the physical, chemical, and toxic properties of the materials concerned; and the physical restrictions in which the PPE is to be worn. Only PPE approved by the regional OSH Program office is be used. All personnel requiring PPE must be made aware of the proper selection, use, and maintenance of that PPE.

17. **WAREHOUSING OPERATIONS.** In work operations where employees handle chemicals in sealed containers not opened under normal conditions of use (e.g., warehouse areas), the following applies:

a. Do not remove or deface labels on incoming containers of hazardous chemicals.

b. Supervisors in the work area must maintain MSDSs received with the incoming shipments of sealed containers. MSDSs must be obtained for sealed containers of hazardous chemicals. Those MSDSs must be available to employees during each work shift and in each work area.

c. Employees must be provided information and training as outlined previously within this SOP.

d. Hazardous materials in warehousing operations which are not maintained in sealed containers not opened under normal conditions of use must be handled in accordance with all provisions of this SOP.

18. **TENANT ACTIVITIES IN GSA FACILITIES**. Building managers are to coordinate with tenant activities in their facilities for the receipt of chemical inventories pertaining to those activities. Copies of these inventories will be forwarded to:

- Local Fire Department and Emergency Response Officials
- Regional OSH Program office

Problems or concerns regarding obtaining chemical inventories from tenant activities should be referred to the regional OSH Program office.

19. **CONTRACTORS AND NON-GSA EMPLOYERS**.

a. The local activity manager must advise outside contractors and non-GSA employers of any chemical hazards which may be encountered by these non-employees during the normal course of their work at GSA facilities. Copies of, or ready access to, MSDSs for hazardous materials under the control of GSA to which the contractor's or non-GSA employer's employees may be exposed and a copy of this SOP will be offered and, if requested, provided to the contractor. Ready access for contractor operations means available at the site of construction.

b. Contractors are required to inform the local activity manager of any hazardous materials they will bring into GSA-controlled work spaces and to provide MSDSs for those hazardous materials. This neither relieves nor replaces the contractor's responsibility to maintain a separate listing of hazardous materials used on this work site, maintain a separate file of MSDSs of hazardous materials used on his work site, and to provide appropriate training to his employees regarding those hazardous materials. General contractors are required to ensure all subcontractors comply with these provisions. It is recommended that during pre-construction meetings, procedures be developed to comply with this requirement.

c. Outside contractors and other non-GSA employers are responsible for training their own employees and informing them of the hazards they will encounter while at GSA facilities. GSA will cooperate in this endeavor by making available to contractors and other non-GSA employers, information which we possess regarding hazardous chemicals in GSA-controlled spaces.

20. **EMERGENCY RESPONSE**.

a. Spill/Leak Control. If a container holding hazardous materials is not in good condition, or if it begins to leak, safely transfer the material into a container that is in good condition, or otherwise prevent the material from being released to the environment or creating a hazard to personnel.

(1) Clean-up of hazardous materials by GSA personnel will be restricted to quantities controllable by one or two employees normally assigned to that work center, approximately less than 10 gallons. If the spill is such that outside or specialized assistance is required, that control and cleanup is beyond the scope of in-house management. If an employee does not feel capable of or secure in handling a spill, regardless of the quantity, due to hazards presented (chemicals are highly toxic, the identity of the chemicals are unknown, etc.), quantity of material, clean-up involves physical hazards (confined space entry, energized circuits present, ignition sources nearby highly flammable materials, etc.), or lack of proper training, the employee should request assistance from coworkers without hesitation. Appendix B contains general guidelines for the cleanup of minor spills or leaks.

(2) Each local activity manager where hazardous materials are used will develop written policies to include cleanup procedures, training, PPE, acquisition of and type of spill kits, etc. General guidelines are presented in GSA SOP for a Written Hazard Communication Program.

(a) GSA personnel are not emergency responders; therefore, even though they probably will be first on the scene of a spill or accident they are not to control or abate spills of hazardous materials greater than 10 gallons. As such, they and their supervisors are required to be trained, per OSHA regulations, at the "First Responder Awareness Level."

(b) Policies developed to address emergency cleanup of hazardous material leaks and spills must address the above restriction. Emergency telephone numbers shall be posted at each location where hazardous materials in quantities greater than 5 gallons are handled, used, or stored. The following should be included on the emergency phone number listing:

- Cognizant fire department.

- Cognizant police or sheriff's department.
- Cognizant local activity manager and/or designee(s).
- Regional OSH Program office.

(c) Copies of the written policies will be maintained at each work center where hazardous materials are stored, handled, or used.

b. Fire Department and Emergency Response Officials. The local building manager must ensure local fire department and emergency response officials are provided with information concerning hazardous chemicals used and/or stored in a GSA work area in the event fire fighting or special rescue efforts are needed. The information that must be supplied includes copies of MSDSs, and storage requirements and locations of hazardous materials. Since tenant agencies must submit inventories to the building manager, all inventories relevant to a particular facility should be combined and provided to the local fire department and emergency response officials.

c. Medical Providers. Medical professionals responsible for providing medical services must be provided, upon request, chemical inventories and MSDSs of hazardous materials to which the employee under care is exposed. If an employee is injured and hazardous materials are known or suspected to be involved, the attending physician should be offered access to MSDSs as soon as possible. The information contained in the inventories and MSDSs can be useful in providing adequate care.

APPENDIX A

HAZARDOUS MATERIALS INVENTORY FORM

HAZARDOUS MATERIALS INVENTORY

NAME OF FACILITY: _____ **DATE OF INVENTORY:** _____

SHOP/AREA NAME: _____ **SUPERVISOR:** _____

NAME OF PRODUCT[1]	MANUFACTURER	QUANTITY ON-HAND	AVERAGE USAGE RATE[2]	CONTAINER TYPE	MSDS ON-HAND?	COMMENTS

NOTES:
"1" = Must be the name listed on the MSDS to identify the product.
"2" = Examples, 1 quart/day, 55 gallons/month, etc.

APPENDIX B

CLEANUP
OF
MINOR SPILLS AND LEAKS
OF
HAZARDOUS MATERIALS

CLEANUP OF MINOR SPILLS AND LEAKS OF HAZARDOUS MATERIALS

This spill policy is predicated on the assumption that extremely high-hazard materials are **not** involved. In circumstances to the contrary, **immediate** notification should be made to the local fire department or Haz-Mat unit for professional assistance.

REMEMBER: GSA personnel are **NOT** emergency responders. If the ***spill is greater than 10 gallons,*** call for assistance. In this case, the person causing or discovering the spill should notify the following **immediately:**

❶ Work Center Supervisor
❷ Property Management Center Director / Building Manager
❸ Regional OSH Program office
❹ EPA

For these spills, professional expertise, such as the fire department or an emergency cleanup crew, will be necessary to ensure a safe and thorough cleanup is accomplished. Do not delay in requesting professional assistance; the Work Center Supervisor or Building Manager should make the request as soon as possible.

The following approximate procedure will generally be followed. Product-specific details should be added by individual workplace supervisors during training sessions:

1. **SPILL CONTROL**.

a. Stop the disturbing activity, evacuate affected personnel, evaluate the situation, and take measures to keep the release from spreading. This may be accomplished by diking or berming the spill, or if necessary, closing and/or sealing off the contaminated area.

b. All personnel in the vicinity, as well as the area's supervisor, shall be **immediately warned** of the release. Caution signs should be posted at all entrances to the affected area if the spill cannot be immediately cleaned up.

c. Don appropriate PPE and apply appropriate absorbing compounds or use the appropriate spill control kit.

d. Personnel who experience skin contact with the hazardous material should thoroughly wash the affected body part(s) with soap and warm water as soon as possible. If clothing becomes contaminated, it should removed and be laundered appropriately.

e. Dependent upon the nature and quantity of the spill, it may be necessary to collect and analyze environmental samples from the contaminated area. Contact the regional OSH Program office for guidance regarding this issue.

f. Maintain a diary on a daily/hourly basis to be incorporated into a Hazardous Chemical Spill Investigation Report (attached). This report will be forwarded to the regional OSH Program office for review and approval. The following data must be collected:

(1) Identify how the release occurred and the duration.

(2) Record directives given to work center personnel, contractors, etc.

(3) List precautions taken with dates and times; e.g., evacuated personnel, posted signs, notified personnel, etc.

(4) List personnel involved, including GSA, custodial, contractors, visitors, etc.

(5) List procedures used to mitigate the release with dates and times; e.g., sealed the area, secured HVAC system, applied absorbent, installed diking, etc.

(6) Record conversations, telecons, etc.

(7) Record environmental samples' locations and results.

2. **DECONTAMINATION**. The field office manager/supervisor and regional OSH Program office should be **contacted IMMEDIATELY** and consulted to determine the extent of contamination and whether or not to hire a firm. The condition for decontamination must be carefully evaluated to determine whether or not to hire a certified professional firm to clean up the site. Guidance regarding specific decontamination procedures beyond those provided above and "how-clean-is-clean" will be provided by the regional OSH Program office.

HAZARDOUS CHEMICAL SPILL INVESTIGATION REPORT

DATE OF INCIDENT: _____ TIME OF INCIDENT: _____

LOCATION OF INCIDENT: _____

_____

TYPE/NAME OF SUBSTANCE: _____

_____

AMOUNT SPILLED: _____ TOTAL DAMAGE COST: $_____

MAN-HOURS: _____hrs MAN-HOURS COST: $_____

MATERIALS DAMAGED: _____ MATERIALS COST: $_____

_____

_____

PERSONNEL EXPOSED/INJURED:

- NAME: _____ AGE: _____ JOB SERIES: _____
  INJURY: _____
  _____
- NAME: _____ AGE: _____ JOB SERIES: _____
  INJURY: _____
  _____
- NAME: _____ AGE: _____ JOB SERIES: _____
  INJURY: _____
  _____
- NAME: _____ AGE: _____ JOB SERIES: _____
  INJURY: _____
  _____

ACCIDENT NARRATIVE: _____

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SAMPLING/IH RESULTS: _____

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